



Public Service Commission  
-M-E-M-O-R-A-N-D-U-M-

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**DATE:** March 13, 2002  
**TO:** Division of Commission Clerk and Administrative Services (Bayó)  
**FROM:** Division of Competitive Markets and Enforcement (İleri) *re: [handwritten initials]*  
**RE:** Docket No. 010963-TP: Investigation into Telecommunications Rate Center Consolidation in the State of Florida

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Please place the following correspondence from Sprint in the above referenced docket.

**March 8, 2002 E-mail Message and Presentation File of Mr. Hoke R. Knox from Ms. Sandy Khazraee (Sprint) to Mr. Levent İleri (FPSC)**

If you have any questions, please call me at 413-6562.

LI  
Attachment

cc: Office of the General Counsel (Christensen)  
Division of Competitive Markets and Enforcement (Bulecza-Banks, Casey)

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DOCUMENT NUMBER - DATE

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FPSC-COMMISSION CLERK

## Levent Ileri

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**From:** Sandy.Khazraee@mail.sprint.com  
**Sent:** Friday, March 08, 2002 12:42 PM  
**To:** lileri@psc.state.fl.us  
**Cc:** rcasey@psc.state.fl.us  
**Subject:** RCC Presentation



RATECTR-FL March  
2002.ppt

Levent,

Attached is a PowerPoint presentation which Hoke Knox will be making at the RCC workshop next Friday. He would like to have you put this in the laptop so that he can give the presentation as a PowerPoint presentation rather than with overheads. Also, because of a previously scheduled family vacation, Hoke needs to leave Tallahassee at mid-afternoon on Friday. Therefore, if you could schedule him to give his presentation in the morning, that would be much appreciated.

I will bring handouts for the commissioners, staff, parties.

Susan Masterton, our attorney, will be addressing the legal/jurisdictional issues. She does not have a formal presentation.

Sandra A. (Sandy) Khazraee  
Senior Regulatory Manager  
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Phone (850) 847-0173 Fax (850) 878-0777



# *Rate Center Consolidation*

March 15, 2002

*Hoke R. Knox*



# *Reason for R. C. Consolidation*

- Number Conservation
  - NPA exhaust is driving Rate Center Consolidation
- LNP Requires an NXX Per Rate Center for each CLEC.
  - Rate Center, boundary of Portability.
- Other Reasons
  - Other demands for NXXs -- PCS, Wireless, Internet, 2nd Lines

# *Rate Center Definition*

- A geographic area used as a metric in rating **wireline** calls. The geographic area (a.k.a. as an “Exchange”) coincides with the wire center(s) boundaries of the ILEC. Rate Centers are used by LECs in conjunction with rating local and intra-LATA calls.

# *Acceptable Consolidations*

- Sprint Supports Number Conservation in:
  - Single ILEC Consolidation of Rate Centers
  - Contiguous Rate Centers
  - Same Local & EAS Calling Scopes
  - Same ECS Routes & Rates
  - Same Basic Local Rates in Combining Rate Centers or PSC Approves Rate Adjustments



# *Unacceptable Consolidations*

- Combining of Multiple ILEC Rate Centers
- Inconsistent Rate Center Consolidations
  - CLEC has different rate center from ILEC
  - Portability Parity Issue for Consumer
- Consolidation of Non-contiguous Rate Centers
  - Different Toll & Local Calling Scopes
  - No Connecting Cable Facilities
  - Many Miles Apart
  - Toll Access Revenue Impact
- None of the above are Competitively Neutral



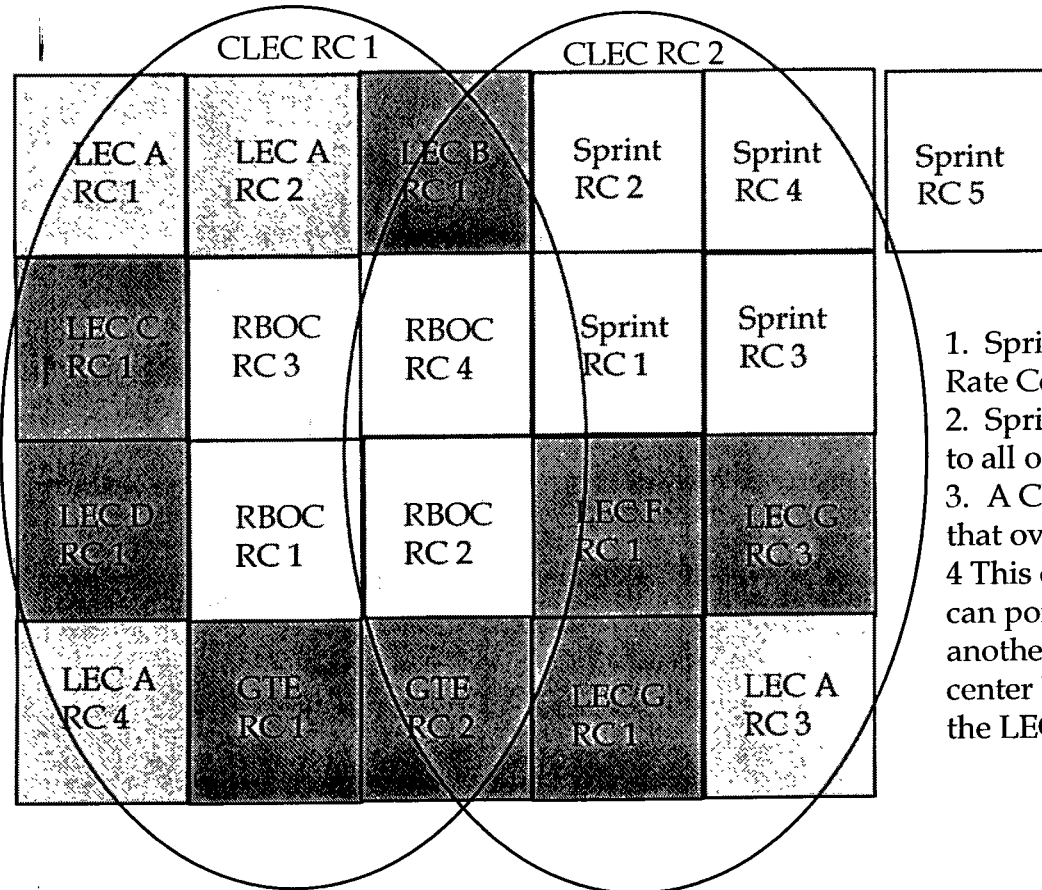
# Combining of Multiple ILEC Rate Centers

LEC A RC1	LEC A RC2	LEC B RC1	Sprint RC 2	Sprint RC 4	Sprint RC 5
LEC C RC 1	RBOC RC 3	RBOC RC 4	Sprint RC 1	Sprint RC 3	
LEC D RC 1	RBOC RC 1	RBOC RC 2	LEC E RC 1	LEC G RC 3	
LEC A RC 4	GTE RC 1	GTE RC 2	LEC G RC 1	LEC A RC 3	

1. Sprint Rate Centers 1-4 have local calling into the RBOC Rate Centers 1-4.
2. Sprint RC 5 has local calling into Sprint RC4, toll calling to all other rate centers.
3. Combining of Multiple LEC rate centers would be the combining of all LEC rate centers excluding Sprint's RC 5.



# Inconsistent Rate Center Consolidation



1. Sprint Rate Centers 1-4 have local calling into the RBOC Rate Centers 1-4.
2. Sprint RC 5 has local calling into Sprint RC4, toll calling to all other rate centers.
3. A CLEC would like to have two inconsistent rate centers that overlap multiple LEC rate centers.
- 4 This creates a parity issue for the consumer in that consumer can port from a LEC to the CLEC. If the consumer moves to another LEC rate center, the number has left the ILEC rate center boundary of portability and cannot be ported back to the LEC.

# Consolidation of Non-contiguous Rate Centers

LEC A RC 1	LEC A RC 2	LEC B RC 1	Sprint RC 2	Sprint RC 4	Sprint RC 5
LECC RC 1	RBOC RC 3	RBOC RC 4	Sprint RC 1	Sprint RC 3	
LECC D RC 1	RBOC RC 1	RBOC RC 2	LECC F RC 1	LECC G RC 3	
LEC A RC 4	GTE RC 1	GTE RC 2	LECC G RC 1	LEC A RC 3	

1. Consolidation of non-contiguous rate centers would be the combining of LEC A's rate centers.
2. Different calling scopes may exist.
3. Different rating may exist.
4. No facilities may connect the rate centers.
5. LEC A RC 3 could be toll calling into the RBOC rate centers.



# *RCC Considerations*

- North American Numbering Council's (NANC's) Number Optimization NANP Expansion (NENO)
  - Initial RCC Analysis indicates that RCC will only extend the life of the NANP a few years once number pooling is implemented.
- September 28, 2000 Florida RCC Working Group Report
  - High Costs for proposed RCCs in Study

# *Critical Considerations for RCC*

- Critical Issue - 911
  - Analyze 911 on All RCCs
- Impacts on Other Carriers
  - One Way EAS Routes with Loss of Toll Revenues into Combined Rate Centers

# *Acceptable Consolidations*

- Sprint Supports Number Conservation in:
  - Single ILEC Consolidation of Rate Centers
  - Contiguous Rate Centers
  - Same Local & EAS Calling Scopes
  - Same ECS Routes & Rates
  - Same Basic Local Rates in Combining Rate Centers or PSC Approves Rate Adjustments